

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION**

WILHEN HILL BARRIENTOS, et al,

Plaintiffs,

v.

CORECIVIC, INC.,

Defendant.

Civil Action No. 4:18-cv-00070-CDL

CORECIVIC, INC.,

Counter-Claimant,

v.

WILHEN HILL BARRIENTOS, et al.,

Counter-Defendants.

Declaration of Meredith B. Stewart

I, Meredith B. Stewart, hereby declare and state as follows:

1. My name is Meredith B. Stewart. I am a Senior Supervising Attorney at the Southern Poverty Law Center. I represent Plaintiffs in the above-captioned litigation.

2. True and accurate copies of the following exhibits are attached to Plaintiffs' Memorandum of Law in Support of their Motion to Compel Trinity Services Group, Inc.'s Response to Subpoena:

Exhibit	Description
1	Plaintiffs' Rule 45 Subpoena to Trinity Services Group, Inc.
2	November 13, 2020 Letter from Plaintiffs to Trinity Services Group, Inc. Summarizing Conferral
3	December 21, 2020 Letter from Plaintiffs to Trinity Services Group, Inc. Regarding Phase 1 Production
4	February 4, 2021 Letter from Trinity Services Group, Inc. to Plaintiffs regarding Subpoena
5	Employee Job Descriptions Produced by Trinity Services Group, Inc. (Redacted and Filed Under Seal)
6	Protective Order in <i>Owino v. CoreCivic</i> , 3:17-cv-01112-JLS-NLS (S.D. Cal.)

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 22nd day of February, 2021 in New Orleans, Louisiana.



Meredith B. Stewart